



**BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES**

383 KENNETH HAHN HALL OF ADMINISTRATION / LOS ANGELES, CALIFORNIA 90012

MEMBERS OF THE BOARD

GLORIA MOLINA
YVONNE BRATHWAITE BURKE
ZEV YAROSLAVSKY
DON KNABE
MICHAEL D. ANTONOVICH

VIOLET VARONA-LUKENS, EXECUTIVE OFFICER
(213) 974-1411

June 17, 2004

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Supervisors:

**CONFLICT OF INTEREST AND DISCLOSURE CODES
(ALL DISTRICTS)
(3-VOTES)**

IT IS RECOMMENDED THAT YOUR BOARD:

Approve the Conflict of Interest and Disclosure Codes for the Compton Unified School District, LA Works, Santa Monica Community College District, and William S. Hart Joint School Financing Authority to be effective the day following your Board's approval.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

The recommendations are necessary in order to comply with the provisions of the Political Reform Act of 1974. In accordance with the Act, the Board of Supervisors must approve a Conflict of Interest and Disclosure Code for each local government agency for which the Board of Supervisors is the code reviewing body.

Pursuant to Government Code Section 87300, every agency must adopt and promulgate a Conflict of Interest and Disclosure Code that, as the code reviewing body for Los Angeles County, the Board of Supervisors must approve before the code can then take effect. In addition, pursuant to Government Code Section 87306, agencies are required to amend their Conflict of Interest Codes when such amendments are necessitated by changed circumstances.

Implementation of Strategic Plan Goals

Approval of the attached codes broadly supports the County Strategic Goal of Workforce Excellence.

The proposed amendments to these Conflict of Interest and Disclosure Codes have been thoroughly reviewed and approved by the code review staff in accordance with the procedures established by your Board.

FISCAL IMPACT/FINANCING

Local governmental agencies must have a Conflict of Interest and Disclosure Code in which designated employees are required to disclose financial interests at a level appropriate to their decision-making authority. These employees make or participate in the making of decisions that may have a foreseeable material effect on a financial interest. Adoption of a Conflict of Interest and Disclosure Code deters potential conflicts of interest, thereby averting misuse of public funds.

The recommended action has no effect on budget revenues and expenditures.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

The code review staff recommends that your Board approve the newly adopted or amended Conflict of Interest and Disclosure Codes for the department/agencies listed below, pursuant to Government Code Section 87300.

Compton Unified School District

- Deletes an obsolete disclosure category.
- Adds the positions of *Senior Director, Athletics & Activities*; *Senior Director, Research & Evaluation*; *Senior Director, Special Needs*; *Director, Classified Personnel*; and *Director of Communications* to the code.
- Changes the titles of 14 positions.
- Renames the *Deputy Superintendent, Administrative Services* and expands the disclosure based on the scope of the position's duties and responsibilities.

LA Works (Human Services Consortium of the East San Gabriel Valley)

- This is a newly formed joint powers agency. The agency has adopted the County's model conflict of interest code.
- The agency has designated the following positions as code filers:
Board of Directors; Chief Executive Officer; Chief Operating Officer; Chief Financial Officer; and Consultant.

Santa Monica Community College District

- The district has adopted the County's model conflict of interest code.

William S. Hart Joint School Financing Authority

- Deletes an obsolete disclosure category.
- Renumbers a disclosure category.
- Adds the positions of *Superintendent* and *Authority Secretary* to the code.

IMPACT ON CURRENT SERVICES

Approving the attached Conflict of Interest and Disclosure Codes for these agencies will further the purposes of the Political Reform Act of 1974 and will require the individuals designated in each agency's code to disclose appropriate economic interests in their Statements of Economic Interests.

Respectfully submitted,

Violet Varona-Lukens
Executive Officer
Attachments (4)

c: Chief Administrative Officer
County Counsel

Conflict of Interest Code
of the

COMPTON UNIFIED SCHOOL DISTRICT

Incorporation of FPPC Regulation 18730 (2 California Code of Regulations, Section 18730) by Reference

The Political Reform Act (Government Code Section 81000, *et seq.*) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 Cal. Code of Regs. 18730), which contains the terms of a standard conflict of interest code. After public notes and hearing, it may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730, and any amendments to it duly adopted by the Fair Political Practices Commission, are hereby incorporated into the conflict of interest code of this agency by reference. This regulation and the attached Appendices (or Exhibits) designating officials and employees and establishing economic disclosure categories shall constitute the conflict of interest code of this agency.

Place of Filing of Statements of Economic Interests

All officials and employees required to submit a statement of economic interests shall file their statements with the agency head; or his or her designee. The agency shall make and retain a copy of all statements filed by its Board Members, Governing Board Members, Alternate Board Members, as appropriate, and its agency head (Agency/Department Head, Executive Officer or Chief Executive Officer, Superintendent, or Director), and forward the originals of such statement to the Executive Office of the Board of Supervisors of Los Angeles County.

The agency shall retain the originals of statements for all other Designated Positions named in the agency's conflict of interest code. All retained statements, original or copied, shall be available for public inspection and reproduction (Gov. Code Section 81008).

(6/02) (Rev.)

COMPTON UNIFIED SCHOOL DISTRICT

EXHIBIT "A"

CATEGORY 1

Persons in this category shall disclose all interest in real property within the jurisdiction. Real property shall be deemed to be within the jurisdiction if the property or any part of it is located within or not more than two miles outside the boundaries of the jurisdiction or within two miles of any land owned or used by the agency.

Persons are not required to disclose property used primarily as their residence or for personal recreational purposes.

CATEGORY 2

Persons in this category shall disclose all investments and business positions.

The Political Reform Act defines investment as follows:

"Investment" means any financial interest in or security issued by a business entity, including but not limited to common stock, preferred stock, rights, warrants, options, debt instruments, and any partnership or other ownership interest, if the business entity or any parent, subsidiary or otherwise related business within the jurisdiction at any time during the two years prior to the time any statement or other action is required under this title. No asset shall be deemed an investment unless its fair market value equals or exceeds two thousands dollars (\$2,000). The term "investment" does not include a time or demand deposit in a financial institution, shares in a credit union, any insurance policy, interest in a diversified mutual fund registered with the Securities and Exchange Commission under the Investment Company Act of 1940 or a common trust fund which is created pursuant to Section 1564 of the Financial Code, or any bond other debt instrument issued by any government or government agency. Investments of an individual include pro rata share of investments of any business entity mutual fund or trust in which the individual or spouse owns directly, indirectly or beneficially, a 10 percent interest or greater.

According to the Political Reform Act, a business position is a position of director, officer, partner, trustee, employee, or any position of management in any organization or enterprise operated for profit, including but not limited to a proprietorship, partnership, firm, business trust, joint venture, syndicate, corporation or association.

COMPTON UNIFIED SCHOOL DISTRICT

EXHIBIT "A" (Continued)

CATEGORY 3

Persons in this category shall disclose all income and business positions.

The Political Reform Act defines income as follows:

"Income" means a payment received, including but not limited to any salary, wage, advance, dividend, interest, rent, proceeds from any sale, gift, including any gift of food or beverage, loan forgiveness or payment of indebtedness received by the filer, reimbursement for expenses, per diem, or contribution to an insurance or pension program paid by any person other than an employer, and including any community property interest in the income of a spouse. Income also includes any outstanding loans. Income of an individual also includes a pro rata share of any business entity or trust in which the individual or spouse owns, directly, indirectly or beneficially, a 10 percent interest or greater.

CATEGORY 4

Persons in this category shall disclose all business positions, investments in, or income (including gifts and loans) received from business entities that manufacture, provide or sell service and/or supplies of a type utilized by the agency and associated with the job assignment of designated positions assigned to this disclose category.

CATEGORY 5

Individuals who perform under contract the duties of any designated position shall be required to file Statements of Economic Interests disclosing reportable interest in the categories assigned to that designated position.

In addition, individuals who, under contract, participate in decisions which affect financial interests by providing information advice, recommendation or counsel to the agency which could affect financial interest shall be required to file Statements of Economic Interests, unless they fall within the Political Reform Act's exceptions to the definition of consultant. The level of disclosure shall be as determined by the executive officer (or head) of the agency.

COMPTON UNIFIED SCHOOL DISTRICT

EXHIBIT "B"

Designated Positions

Disclosure Categories

Governing Board Member	1, 2, 3
Superintendent	1, 2, 3
Deputy Superintendent, Administrative Services	1, 2, 3
Area Superintendent	1, 2, 3
Associate Superintendent, Business Services	1, 2, 3
Associate Superintendent Curriculum/Instruction	4
Director of ROP/Vocational Education/School to Work Programs	4
Principal Alternative Education	4
Senior Director - Fiscal Services	4
Director, Special Projects	4
Senior Director, Nutrition Services	4
Administrator, Technology/Staff Development	4
Director, Transportation Services	1, 4
Director, Purchasing Services	4
Director, Employer/Employee Relations	4
Director, Information Technology	4
Senior Director, Research Evaluation and Student Records	4
Chief, Facilities Officer	4
Risk Manager	4
Chief, School Police	4
Senior Director, Research & Evaluation	4
Senior Director, Athletics & Activities	4
Senior Director, Special Needs	4
Director, Classified Personnel	4
Director of Communications	4
Consultant	5

Effective:

Conflict of Interest Code
of the

LA WORKS
(HUMAN SERVICES CONSORTIUM OF THE EAST SAN GABRIEL VALLEY)

Incorporation of FPPC Regulation 18730 (2 California Code of Regulations, Section 18730) by Reference

The Political Reform Act (Government Code Section 81000, *et. seq.*) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 Cal. Code of Regs. 18730), which contains the terms of a standard conflict of interest code. After public notes and hearing, it may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730, and any amendments to it duly adopted by the Fair Political Practices Commission, are hereby incorporated into the conflict of interest code of this agency by reference. This regulation and the attached Appendices (or Exhibits) designating officials and employees and establishing economic disclosure categories shall constitute the conflict of interest code of this agency.

Place of Filing of Statements of Economic Interests

All officials and employees required to submit a statement of economic interests shall file their statements with the agency head; or his or her designee. The agency shall make and retain a copy of all statements filed by its Board Members, Governing Board Members, Alternate Board Members, as appropriate, and its agency head (Agency/Department Head, Executive Officer or Chief Executive Officer, Superintendent, or Director), and forward the originals of such statement to the Executive Office of the Board of Supervisors of Los Angeles County.

The agency shall retain the originals of statements for all other Designated Positions named in the agency's conflict of interest code. All retained statements, original or copied, shall be available for public inspection and reproduction (Gov. Code Section 81008).

(6/02) (Rev.)

**LA WORKS
(HUMAN SERVICES CONSORTIUM OF THE EAST SAN GABRIEL VALLEY)**

EXHIBIT "A"

CATEGORY 1

Persons in this category shall disclose investments in business positions with and income from:

- A. Business entities located in Los Angeles County whose primary activity is to train persons for employment with other entities.
- B. Employment agencies located in LA Works' service area.
- C. Any business entity that employs, or plans to employ, persons who have received Workforce Investment Act (WIA) training for which LA Works is or was responsible where the total number of such persons employed by the business entity during any 12-month period exceeds 20% of the total work force of the entity.

CATEGORY 2

Persons in this category shall disclose annual income, investment, or business positions with business entities that receive, or plan to receive, contracts from LA Works directly, or through any of its service providers, for the training or placement of persons under any WIA.

Types of financial interest which must be disclosed include, but not limited to: ("Financial Interest" means income from, investments in and income (including gifts and loans) received from business entities doing business within the LA Works service area.

- 1. Computer Equipment Manufacturers and Suppliers
- 2. Computer Software Manufacturers and Suppliers
- 3. Computer-related Consultancy Firms
- 4. Construction Materials Suppliers and Subcontractors
- 5. Consultancy Firms
- 6. Hardware Suppliers and Manufacturers
- 7. Insurance and Annuity Companies
- 8. Motor Vehicle Lubrication and Fuel Suppliers
- 9. Motor Vehicle Parts and Suppliers and Manufacturers
- 10. Motor Vehicle Tire Suppliers and Manufacturers
- 11. Office Machine Manufacturers and Suppliers
- 12. Office Supplies
- 13. Travel Agencies

**LA WORKS
(HUMAN SERVICES CONSORTIUM OF THE EAST SAN GABRIEL VALLEY)**

EXHIBIT "A" (Continued)

CATEGORY 3

Persons in this category shall disclose interests in real property in the LA Works service area which were or are the type that could be acquired by, leased or otherwise used by any agency receiving funds under the jurisdiction of LA Works.

CATEGORY 4

Individuals who perform under contract the duties of any designated position shall be required to file Statements of Economic Interests disclosing reportable interest in the categories assigned to that designated position.

In addition, individuals who, under contract, participate in decisions which affect financial interests by providing information advice, recommendation or counsel to the agency which could affect financial interest shall be required to file Statements of Economic Interests, unless they fall within the Political Reform Act's exceptions to the definition of consultant. The level of disclosure shall be as determined by the executive officer (or head) of LA Works.

LA WORKS
(HUMAN SERVICES CONSORTIUM OF THE EAST SAN GABRIEL VALLEY)

EXHIBIT "B"

Designated Positions

Disclosure Categories

Members of the Board of Directors	1, 2, 3
Chief Executive Officer	1, 2, 3
Chief Operating Officer	1, 2, 3
Chief Financial Officer	1, 2, 3
Consultant	4

Conflict of Interest Code
of the

SANTA MONICA COMMUNITY COLLEGE DISTRICT

Incorporation of FPPC Regulation 18730 (2 California Code of Regulations, Section 18730) by Reference

The Political Reform Act (Government Code Section 81000, *et seq.*) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 Cal. Code of Regs. 18730), which contains the terms of a standard conflict of interest code. After public notes and hearing, it may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730, and any amendments to it duly adopted by the Fair Political Practices Commission, are hereby incorporated into the conflict of interest code of this agency by reference. This regulation and the attached Appendices (or Exhibits) designating officials and employees and establishing economic disclosure categories shall constitute the conflict of interest code of this agency.

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The agency shall retain the originals of statements for all other Designated Positions named in the agency's conflict of interest code. All retained statements, original or copied, shall be available for public inspection and reproduction (Gov. Code Section 81008).

(6/02) (Rev.)

SANTA MONICA COMMUNITY COLLEGE DISTRICT

EXHIBIT "A"

CATEGORY 1

Persons in this category shall disclose all interests in real property within the jurisdiction. Real property shall be deemed to be within the jurisdiction if the property or any part of it is located within or not more than two miles outside the boundaries of the jurisdiction or within two miles of any land owned or used by the agency.

Persons are not required to disclose property used primarily as their residence or for personal recreational purposes.

CATEGORY 2

Persons in this category shall disclose all investments and business positions.

The Political Reform Act defines investment as follows:

"Investment" means any financial interest in or security issued by a business entity, including but not limited to common stock, preferred stock, rights, warrants, options, debt instruments, and any partnership or other ownership interest, if the business entity or any parent, subsidiary or otherwise related business within the jurisdiction at any time during the two years prior to the time any statement or other action is required under this title. No asset shall be deemed an investment unless its fair market value equals or exceeds two thousand dollars (\$2,000). The term "investment" does not include a time or demand deposit in a financial institution, shares in a credit union, any insurance policy, interest in a diversified mutual fund registered with the Securities and Exchange Commission under the Investment Company Act of 1940 or a common trust fund which is created pursuant to Section 1564 of the Financial Code, or any bond or other debt instrument issued by any government or government agency. Investments of an individual include pro rata share of investments of any business entity mutual fund or trust in which the individual or spouse owns directly, indirectly or beneficially, a 10 percent interest or greater.

According to the Political Reform Act, a business position is a position of director, officer, partner, trustee, employee, or any position of management in any organization or enterprise operated for profit, including but not limited to a proprietorship, partnership, firm, business trust, joint venture, syndicate, corporation or association.

SANTA MONICA COMMUNITY COLLEGE DISTRICT

EXHIBIT "A" (Continued)

CATEGORY 3

Persons in this category shall disclose all income and business positions.

The Political Reform Act defines income as follows:

"Income" means a payment received, including but not limited to any salary, wage, advance, dividend, interest, rent, proceeds from any sale, gift, including any gift of food or beverage, loan forgiveness or payment of indebtedness received by the filer, reimbursement for expenses, per diem, or contribution to an insurance or pension program paid by any person other than an employer, and including any community property interest in the income of a spouse. Income also includes any outstanding loans. Income of an individual also includes a pro rata share of any business entity or trust in which the individual or spouse owns, directly, indirectly or beneficially, a 10 percent interest or greater.

CATEGORY 4

Persons in this category shall disclose all business positions, investments in, or income (including gifts and loans) received from business entities that manufacture, provide or sell service and/or supplies of a type utilized by the agency and associated with the job assignment of designated positions assigned to this disclosure category.

CATEGORY 5

Individuals who perform under contract the duties of any designated position shall be required to file Statements of Economic Interests disclosing reportable interest in the categories assigned to that designated position.

In addition, individuals who, under contract, participate in decisions which affect financial interest by providing information advice, recommendation or counsel to the agency which could affect financial interest shall be required to file Statements of Economic Interests, unless they fall within the Political Reform Act's exceptions to the definition of consultant. The level of disclosure shall be determined by the executive officer (or head) of the agency.

**SANTA MONICA COMMUNITY COLLEGE DISTRICT
EXHIBIT “B”**

<u>Designated Positions</u>	<u>Disclosure Categories</u>
Member of the Board of Trustees	1, 2, 3
Superintendent /President	1, 2, 3
Executive Vice President, Business and Administration	1, 2, 3
Associate Vice President Business Services	1, 2, 3
Director, Auxiliary Services	1, 2, 3
Bookstore Manager	4
Associate Vice President Facilities	4
Facilities Administrator	4
Director of Purchasing	1, 2, 3
Vice President Human Resources	4
Vice President Academic Affairs	4
Assistant Dean, Continuing Education	4
Associate Vice President Planning / Development	4
Vice President Student Affairs	4
Dean International Education	4
Director International Programs	4
Director Marketing	4
Dean Information Technology	4
Director Events and Contracts	4
Consultant	5

Effective:

Conflict of Interest Code
of the

WILLIAM S. HART JOINT SCHOOL FINANCING AUTHORITY

Incorporation of FPPC Regulation 18730 (2 California Code of Regulations, Section 18730) by Reference

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Place of Filing of Statements of Economic Interests

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The agency shall retain the originals of statements for all other Designation Positions named in the agency's conflict of interest code. All retained statements, original or copied, shall be available for public inspection and reproduction (Gov. Code Section 81008).

(6/02) (Rev.)

WILLIAM S. HART JOINT SCHOOL FINANCING AUTHORITY

EXHIBIT "A"

CATEGORY 1

Persons in this category shall disclose all interest in real property within the jurisdiction. Real property shall be deemed to be within the jurisdiction if the property or any part of it is located within or not more than two miles outside the boundaries of the jurisdiction or within two miles of any land owned or used by the agency.

Persons are not required to disclose property used primarily as their residence or for personal recreational purposes.

CATEGORY 2

Persons in this category shall disclose all investments and business positions.

The Political Reform Act defines investment as follows:

"Investment" means any financial interest in or security issued by a business entity, including but not limited to common stock, preferred stock, rights, warrants, options, debt instruments, and any partnership or other ownership interest, if the business entity or any parent, subsidiary or otherwise related business within the jurisdiction at any time during the two years prior to the time any statement or other action is required under this title. No asset shall be deemed an investment unless its fair market value equals or exceeds two thousands dollars (\$2,000). The term "investment" does not include a time or demand deposit in a financial institution, shares in a credit union, any insurance policy, interest in a diversified mutual fund registered with the Securities and Exchange Commission under the Investment Company Act of 1940 or a common trust fund which is created pursuant to Section 1564 of the Financial Code, or any bond other debt instrument issued by any government or government agency. Investments of an individual include pro rata share of investments of any business entity mutual fund or trust in which the individual or spouse owns directly, indirectly or beneficially, a 10 percent interest or greater.

According to the Political Reform Act, a business position is a position of director, officer, partner, trustee, employee, or any position of management in any organization or enterprise operated for profit, including but not limited to a proprietorship, partnership, firm, business trust, joint venture, syndicate, corporation or association.

WILLIAM S. HART JOINT SCHOOL FINANCING AUTHORITY

EXHIBIT "A" (Continued)

CATEGORY 3

Persons in this category shall disclose all income and business positions.

The Political Reform Act defines income as follows:

"Income" means a payment received, including but not limited to any salary, wage, advance, dividend, interest, rent, proceeds from any sale, gift, including any gift of food or beverage, loan forgiveness or payment of indebtedness received by the filer, reimbursement for expenses, per diem, or contribution to an insurance or pension program paid by any person other than an employer, and including any community property interest in the income of a spouse. Income also includes any outstanding loans. Income of an individual also includes a pro rata share of any business entity or trust in which the individual or spouse owns, directly, indirectly or beneficially, a 10 percent interest or greater.

CATEGORY 4

Persons in this category shall disclose all business positions, investments in, or income (including gifts and loans) received from business entities that manufacture, provide or sell service and/or supplies of a type utilized by the agency and associated with the job assignment of designated positions assigned to this disclose category.

CATEGORY 5

Individuals who perform under contract the duties of any designated position shall be required to file Statements of Economic Interests disclosing reportable interest in the categories assigned to that designated position.

In addition, individuals who, under contract, participate in decisions which affect financial interests by providing information advice, recommendation or counsel to the agency which could affect financial interest shall be required to file Statements of Economic Interests, unless they fall within the Political Reform Act's exceptions to the definition of consultant. The level of disclosure shall be as determined by the executive officer (or head) of the agency.

WILLIAM S. HART JOINT FINANCING AUTHORITY

“EXHIBIT B”

Designated Position

Disclosure Category

Consultant

5

Officials Who Manage Public Investments:

It has been determined that the positions listed below manage public investments and must make disclosure pursuant to Government Code Section 87200, *et seq.*

Board Member, William S. Hart Joint Financing Authority

Superintendent

Authority Secretary

Effective: